

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

KATHERINE MARIA PINNER, )  
                                )  
Plaintiff,                 )  
                                )  
vs.                         ) Case No. 4:22-cv-00870-CDP  
                                )  
AMERICAN ASSOCIATION OF     )  
ORTHODONTISTS,              )  
                                )  
Defendant.                 )

**DEFENDANT'S PRETRIAL MEMORANDUM**

COMES NOW defendant, American Association of Orthodontists, by and through counsel, and submit the following in accordance with the Court's Order Relating to Trial dated September 19, 2024.

1. **Stipulations and Objections to Plaintiff's Exhibits:** see Defendant's legal Memorandum in Support of Objections to Certain of Plaintiff's Exhibits attached; **Exhibit A** attached thereto which consists of an itemized table of Stipulations and Objections to all 190 of Plaintiff's trial exhibits; and see Defendant's Motion to Exceed Page Limit as to the Memorandum in Support attached.

2. **Testimony Designation and Objections:** see Defendant's Objections and Counter-designations to Plaintiff's Request for Admission and Interrogatory Designations as prepared in table format (with case caption coversheet) for the Court's convenience and attached; and see highlight copy of Plaintiff's designations (yellow) and Defendant's counter-designations (green) attached as **Exhibit A** thereto.

3. **Request for Additional and Modified Jury Instructions:** *see* Defendant's Objections, Request for Modification, and/or Supplementation of Plaintiff's Proposed Jury

Instructions attached; and **Exhibits A, B, and C** attached thereto containing proposed supplemental instructions.

4. **Oppositions to Motions in Limine (NOT APPLICABLE):** Defendant did not receive Motions in Limine from Plaintiff. Therefore, no oppositions are filed herewith.

FOX SMITH, LLC

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Attorneys for Defendant

**CERTIFICATE OF SERVICE**

I hereby certify that on November 26, 2024, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following:

Via E-Mail and U.S. Mail

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PLAINTIFF PRO SE

/s/ Thomas J. Smith \_\_\_\_\_